

EXHIBIT 2

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF ILLINOIS

3 -----X
4 H.B., A MINOR, BY STACY BARTOLINI, et al.,

5
6 Plaintiff,

7
8 Civil Action No.: 15-cv-702-NJR-SCW

9
10 ABBOTT LABORATORIES INC.,

11
12 Defendant.

13 -----X

14
15 CONFIDENTIAL - SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

16
17 DEPOSITION OF STEWART BRAMSON, M.D.

18
19 Princeton, New Jersey

20
21 Wednesday, December 30, 2015

22
23 Reported by:

24
25 Angela M. Shaw-Crockett, CCR, RMR, LSR

1 litigation.

2 Do you understand that?

3 A. Yes.

4 Q. Doctor, I think -- do you recall we
5 established earlier that several AEDs, including
6 Depakote, doubled as antiepileptic drugs and mood
7 stabilizers?

8 A. Yes.

9 Q. Now, if you look at the front page of this
10 document, top of it reads, "Neurology Consultant
11 Meeting, June 2, 2001, Chicago, Illinois."

12 Do you see that?

13 A. Yes.

14 Q. So it appears that the date of this
15 document is June 2, 2001?

16 A. Yes.

17 Q. If you turn the page, there are numbered
18 sections. Do you see that?

19 A. There are what?

20 Q. Numbered sections.

21 A. Yes, I see.

22 Q. And there's a Section 4. Do you see that?

23 A. Yes.

24 Q. "Discuss and develop a flowchart for the
25 treatment of adult epilepsies" --

1 (A discussion was held off the record.)

2 BY MR. ROSEMOND:

3 Q. There's a Section 4. See that?

4 A. Yes. Section 4.

5 Q. And it reads, "Discuss and develop a
6 flowchart from the treatment of adult epilepsies and
7 co-morbid conditions (e.g., behavioral disorders)."

8 Do you see that?

9 A. Yes.

10 Q. And then there's three bullet points
11 underneath that. Do you see that?

12 A. Yes.

13 Q. Then the first bullet point reads, "Not
14 use Depakote in female of childbearing years due to
15 teratogenic potential. Many are not aware of the
16 actual risk." Do you see that?

17 A. Yes.

18 Q. Doctor, as I said earlier, looking at
19 this, is -- this information that you're reading
20 here, would that have been important for you to know
21 when you're prescribing Depakote in, say, 2001?

22 MR. MARSHALL: Objection to form.

23 A. Well, I would have wanted to know more
24 context. In other words, this is a -- it's a single
25 sentence. I would want to know how come whatever it

1 is.

2 And, also, I had just read on the previous
3 page that there was a doctor at this conference who
4 recommended using it in pregnant women, but in a
5 certain way, a particular way. So I kind of have to
6 figure out how to put those two pages together.

7 BY MR. ROSEMOND:

8 Q. Okay. Well, Doctor, if, in 2002, Abbott
9 would have informed you that Depakote was
10 potentially twice as teratogenic as other mood
11 stabilizers, would that have been something for you
12 to consider when prescribing Depakote for women of
13 childbearing potential?

14 MR. MARSHALL: Objection to form, assumes
15 a fact not established.

16 A. Yes.

17 BY MR. ROSEMOND:

18 Q. Doctor, I'm going to hand you what's been
19 marked as Exhibit 8 to your deposition?

20 (Exhibit 8 was received and marked for
21 identification, as of this date.)

22 A. (Witness reviews document.)

23 BY MR. ROSEMOND:

24 Q. Doctor, have you had a chance to review
25 this exhibit?

1 CERTIFICATE

2
3 STATE OF NEW YORK)

4 : ss

5 COUNTY OF NEW YORK)

6 I, Angela M. Shaw-Crockett, a Certified Court
7 Reporter, Registered Merit Reporter and Notary Public within
8 and for the States of New York, New Jersey and Connecticut,
9 do hereby certify:

10 That STEWART BRAMSON, M.D., the witness whose
11 deposition is herein before set forth, was duly sworn by me
12 and that such deposition is a true record of the testimony
13 given by such witness.

14 I further certify that I am not related to any of
15 the parties to this action by blood or marriage and that I
16 am in no way interested in the outcome of this matter.

17 In witness whereof, I have hereunto set my hand
18 this 4th day of January, 2016.

19
20 -----
21 ANGELA M. SHAW-CROCKETT, CCR, RMR, LSR
22 LICENSE NO. XI00218400
23
24
25